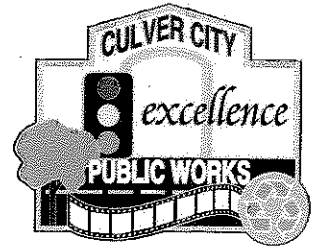


# Culver CITY

PUBLIC WORKS DEPARTMENT  
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Charles D. Herbertson, P.E., L.S.  
Public Works Director/City Engineer

February 14, 2014

Christopher Chafee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

Re: LOS Alternatives - Preliminary Evaluation of Alternative Methods of Transportation Analysis for CEQA

Dear Mr. Chafee:

The following are comments on SB 743 by Culver City's Department of Public Works. The comments are staff recommendations, and do not reflect the City of Culver City's formal position, which requires approval by the City Council. SB 743 requires OPR to provide an alternative to Level of Service (LOS) for evaluating traffic impacts in transit priority areas, within one-half mile of a major transit stop. It also gives OPR the ability to establish alternative metrics used for traffic LOS for transportation impacts outside transit priority areas, which may include retention of LOS. Once the guidelines are certified by the Secretary of Natural Resources Agency, automobile delay as described solely by LOS cannot be considered a significant impact on the environment.

Based on Culver City's experience of hearings for new development projects at Planning Commission and City Council, traffic is one of the most important, if not the most important issue to the residents attending the hearings. Residents often testify that the proposed development will increase traffic congestion and result in gridlock at various locations near the development. These complaints by residents will occur regardless if the development is within or outside the transit priority area. Therefore, we believe traffic studies for new developments should, in addition to the new metrics established under SB 743, continue to analyze LOS as a measure of traffic congestion and present potential transportation improvement measures to reduce the congestion caused by the project, both inside and outside of the transit priority areas. Even though under CEQA LOS cannot be used as a basis to establish significant impacts in a transit priority area, LOS and levels of traffic congestion are useful for the community and to the City decision makers.

We believe the correct approach to good transportation planning is a multi-modal approach, whereby all modes of transportation are improved to accommodate travel demands, including the road system. There are many roadway improvement measures that improve traffic flow without producing detrimental effects on the other modes of transportation. In addition to roadway widening, capacity can be enhanced by restriping, peak-period parking restrictions, improved traffic signal synchronization, improved vehicle detection, traffic cameras, etc. In fact, improving roadway traffic flow facilitates bus travel, which is much more available to the public than fixed rail transit.

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*Culver City Employees take pride in effectively providing the highest levels of service to enrich the quality of life for the community by building on our tradition of more than seventy-five years of public services, by our present commitment, and by our dedication to meet the challenges of the future*

We believe the State should establish clear definitions of a transit priority area. For the "Infill opportunity zone", specify if the one-half mile from a major transit stop or high-quality corridor is a walking route or within a one-half radius distance. Also, specify if one side of a street can be in the zone and other side outside the zone.

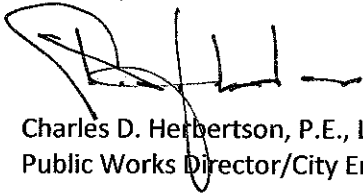
Because of cities' limited funds, we recommend that under the new guidelines, private developers maintain the financial responsibility to fund development related impacts.

It appears the new criteria used to evaluate a development's impact on traffic will require a traffic model to calculate VMT or other Metric. Culver City borders the City of Los Angeles and County of Los Angeles unincorporated area, and the three agencies coordinate developments' traffic studies to determine the impacts of developments and required mitigation measures. We recommend that the cities and County in our region use the same model for consistency across city boundaries, and developers' traffic consultants use that model as a basis of their traffic study. The adopted methodology should be simple and not incur significant cost for the cities. The State may need to assist the cities financially to develop the sophisticated modeling tools needed to estimate VMT or any other metric chosen.

Similar to other cities, Culver City does not require some small projects to conduct traffic studies. The State should provide a recommended threshold beyond which a traffic study is required.

Thank you for the opportunity to provide comments and suggestions regarding your efforts to amend CEQA Guidelines, as required by Senate Bill 743.

Sincerely,



Charles D. Herbertson, P.E., L.S.  
Public Works Director/City Engineer